



**MICHIGAN CREDIT UNION LEAGUE LEGISLATIVE FORUM
MICHIGAN CREDIT UNION LEAGUE LEGISLATIVE ACTION FUND
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Colleen Manning
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street
Washington, DC 20463

RE: Michigan Credit Union League Legislative Action Fund (C00139279) Request for
For Additional Information for 2001 Mid-Year Report.

Dear Ms. Manning:

Attached is an amended report for the above referenced period along with the following
information pertaining to our Mid-Year Report.

Regarding your questions concerning disbursements on line 21(b):

The disbursements made to "Dow Chemical ECU", "Ottawa County School ECU", "CPFCU", and "Frankenmuth Credit Union" were not refunds of contributions to the Michigan Credit Union League Legislative Action Fund (the "Fund"). The recipients of these disbursements are credit union members of the Michigan Credit Union League (the "League"), the Fund's connected organization. The regulations of the Federal Election Commission (the "Commission") permit an incorporated membership organization, such as the League, to use general treasury funds of the League, including dues monies or membership fees, to pay solicitation expenses on behalf of the Fund (11 CFR §114.5(b)). The Commission also indicates that corporate members of an incorporated trade association, who meet the definition of "members" under the Federal Election Campaign Act and regulations, may contribute funds or merchandise to defray administrative and solicitation expenses of the trade association's separate segregated fund (Advisory Opinion 1989-18). For example, in Advisory Opinion 1982-36, the Commission permitted a trade association to encourage its corporate members to make in-kind donations of corporate merchandise which would then be used by the trade association PAC for fundraising purposes. Accordingly, since the credit union members of the League meet the Commission's requirements as "members" of the League, the League and credit union members of the League may purchase or donate fundraising items as a solicitation expense to be sold to benefit the Fund. This is

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